



JOINT MANAGEMENT PLAN REVIEW

Scoping Comments: Coastal Development: Dredge Disposal

The MBNMS received approximately 12,000 comments from the public and specific comments from the MBNMS Advisory Council during the management plan review scoping process that directed the Sanctuary to actively pursue protection of the ecosystem and enhance biodiversity through management strategies. The Sanctuary also received a large number of comments pertaining to the Sanctuary's role in wildlife disturbance. A summary of these comments is presented below:

The following is a summary of all the JMPR Comments related to Dredge Disposal

- When the Sanctuary was being negotiated, harbors were told that the Sanctuary would not have permit authority over dredging, but it does. (MB)
- The existing language characterizes all dredging as bad and does not allow for minor impacts. (MB)
- Existing language concerning dredging seems to constrain the staff from being as helpful to harbors as they could be. (MB)
- There should be language put in the management plan that reflects the positive benefits of harbors. (MB/GF)
- Sanctuary policy regarding harbor dredging does not account for naturally occurring, increased sediment volumes over time; does not allow scientific finding in ocean currents, wave forces, or bathymetry to alter dredge disposal techniques or location for the overall benefit of the harbor and/or the environment; does not recognize "beneficial use" of dredge material as a concept. This is a federally recognized course of study which seeks to re-use sediment in productive ways, and concurrently not to waste clean materials. (MB)
- Concerned about the impacts of dredging on natural resources. (MB/GF)
- Dredging and dredge disposal can cause burial of Benthic organisms; water quality impacts associated with suspended sediments, and contamination concerns.
- Sanctuary view of dredging has been "painted with a single brush and single color"; this prejudiced view does not reflect the abundant science discriminating beneficial dredging from harmful dredging. (MB)
- Streamline the permitting process for dredging. Sanctuary should establish an interagency dredging permit coordination process, based on the SF model. (MB)
- Sanctuary should not regulate dredging beyond other agencies. (MB)
- Harbor dredge spoils should be disposed of at land disposal facilities. (MB)
- Harbors should continue dumping dredge spoils into designated sites. (MB)



Scoping Comments: Wildlife Disturbance—Marine Mammals, Seabirds and Turtles

- Sanctuary should address issue of management of dredge spoils and DDT contamination. (MB)
- Sanctuaries should not require permits for dredging. (MB/GF)
- Sedimentation occurs naturally during storm events at Pillar Point Harbor. Sanctuary should allow harbor to dredge, and dispose of dredge spoils on the other side of the breakwater, where the beach area is eroding. (MB)
- Clarify that the Sanctuary does not regulate or issue permits for dredging. (MB)
- Any Sanctuary policy on dredging should be no more restrictive than other directly responsible regulatory agencies. (MB)
- Concerned about DDT in Moss Landing. Should be deposited at hazardous waste site. (MB)
- Moss Landing should be dredged and deposited in the ocean. Onshore disposal costs too much, is labor intensive and highly polluting. More damage is caused by onshore disposal than is being protected. (MB)
- Consider using non-contaminated dredge materials for beach replenishment. (MB)
- Sources of sediment material from landslides should be examined; if the landslide is determined to be due to natural processes, then material should be disposed of in the Sanctuary. (MB)
- Regulations should be changed to treat sediment as a nutrient, and not a pollutant, as it is currently considered. (MB)
- Evaluate whether Sanctuary needs to be a regulating authority for dredging. (MB)
- Do not become another layer of bureaucracy in dealing with fishing and dredging. (All)
- Concerned about impacts to the seafloor from dredging and disposal and continued bottom trawling. (MB)
- Continue to allow disposal of clean fine-grained sand in sanctuary. (MB)
- Sanctuary should discuss with USACOE to make improvements to harbors and improve technology for dredging. (MB)
- Sanctuary should work more closely with ports and harbors to identify reasonable prudent approaches to dredging, that allow for safe operation of those ports with minimal impacts to Sanctuary resources. (MB)
- No wharf extensions or additional breakwater structures. (MB)
- Moss Landing Harbor should be included in the Sanctuary boundaries, to protect Elkhorn Slough. (MB)